REMARKS

No amendments are made. The claims are listed in the previous section only for the Examiner's convenience.

1. Rejection of claim 3 under 35 U.S.C. 103(a) as being unpatentable over Moore et al. (US 6,147,863) in view of Shu et al. (US 6,400,843):

The applicant contends that there is a lack of motivation for one of ordinary skill in the art to make this combination. The applicant makes two points regarding this position, and hopes the Examiner can consider these points.

First, AGP is not a true bus, that is, AGP is not a bus as ISA is a bus. Specifically, there is no existing protocol/hardware/architecture for connecting multiple AGP master devices (e.g. graphics cards) to an AGP target device (e.g. a chipset or CPU). AGP is for making a one-to-one connection of one master device to one target device. Though, AGP is commonly referred to as a bus, it differs in at least this respect from a true bus.

Please refer to the attached pages (numbered 27 and 257) of the AGP Specification, Revision 2.0. Page 27, line 5 (first bulleted item) and footnote 3, clearly teach that AGP is not a true bus and thus not readily adaptable to multiple devices. Footnote 3 indicates that more than two devices (AGP agents) are not precluded, however, also indicates that much consideration would

have to be made by the designer to implement this. Page 257 is a glossary for reference of the key terminology (i.e. master/target AGP devices).

Therefore, the applicant argues that it is not obvious to simply replace ISA slots with AGP slots. Referring to Moore's Fig.1, replacing the plurality of ISA slots 4, 14 with a plurality of AGP slots would result in a non-functioning or erroneously functioning device, since AGP cannot handle multiple master devices (e.g. graphics cards). However, going a step further and removing the remaining ISA slots 4 from Moore's device would (a) change the way Moore's device operates by removing the capability of expansion to other functionality on other cards, and (b) in part be "re-inventing" the claimed subject matter. (Please note that the applicant is not arguing that AGP is not a bus, but rather that the AGP and ISA buses function in substantially different manners.)

In summary of the first point, the combination of prior art references runs counter to Moore's clear intention of providing a properly functioning device offering expandability through a plurality of ISA slots 4, since AGP and ISA are not readily interchangeable.

The second point is that the applicant disagrees with the Examiner's assertion that Shu discloses "an ISA bus such as AGP bus" in column 5, lines 45-48.

Shu's column 5, lines 45-48 disclose

"For example, some personal computers incorporate only a so called Industry Standard Architecture (ISA) bus. Other computers incorporate an ISA bus as well as a higher bandwidth bus conforming to some standard such as the VESA, PCI or AGP bus standards. Preferably, display control 48 connects to a high-bandwidth bus to improve the speed of display."

Clearly Shu is not stating that AGP is a type of ISA as the Examiner asserts, but rather that some computers incorporate both ISA and AGP buses.

In summary of the second point, the applicant generally agrees with Shu's statement above, however, the applicant disagrees with the Examiner's interpretation of it. Therefore, the applicant argues that Shu does not teach or suggest interchangeability of ISA and AGP, and thus, that the combination of prior art references does not have fair motivation.

Thus, the applicant respectfully requests consideration of the above arguments that AGP and ISA are not interchangeable and that Shu does not teach or suggest such interchangeability, and accordingly requests withdrawal of this rejection and reconsideration and allowance of claim 3.

2. Rejection of claim 4 under 35 U.S.C. 103(a) as being unpatentable over Moore et al. and Shu et al. as applied to claim 3 above, and further in view of Prior art, figure 1 (submitted by applicant, hereafter APA):

Please refer to Item 1 above.

Claim 4 is dependent and should be allowed if claim 3 is found allowable.

Sincerely yours,

Winston Hsu Date: December 20, 2004

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Attachments:

Pages 27 and 257 of AGP Specification, Revision 2.0 (2 pages)